

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

|                            |   |                      |
|----------------------------|---|----------------------|
| IN RE:                     | § |                      |
|                            | § | CASE NO. 23-40316-11 |
| DFW BOAT SPECIALISTS, LLC, | § |                      |
|                            | § |                      |
| DEBTOR.                    | § | CHAPTER 11           |

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**NEXTGEAR CAPITAL, INC.'S WITNESS AND EXHIBIT LIST**

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TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

NextGear Capital, Inc. ("NextGear") files this its Witness and Exhibit List for the final hearing on March 21, 2023 at 9:30 a.m., in connection with the Debtor's Emergency Motion for Authority to Use Cash Collateral [Doc. # 5], as follows:

**WITNESSES**

NextGear reserves the right to call the below referenced witnesses for testimony at the trial setting including the following:

**Christopher V. Arisco**  
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420 Throckmorton Street, Suite 1210  
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*Attorney for NextGear*

**Alan B. Padfield**  
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**John Wick**

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*Representative for NextGear*

**Richard Scott Gay**

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*Representative for Debtor*

**Eric A. Liepins**

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Telephone: 972-991-5591  
Facsimile: 972-991-5788

*Attorney for Debtor*

Any persons identified by Debtor in the schedules, statements, or filings in the above-styled bankruptcy case.

NextGear reserves the right to call any other witness designated or identified by any other party at the hearing.

**EXHIBITS**

| Ex. # | Description  | Offered | Objection | Admitted | Disposition |
|-------|--|---------|-----------|----------|-------------|
| NG-A  | Affidavit of John Wick   |         |           |          |             |
| NG-B  | NextGear Demand Promissory Note and Loan Security Agreement dated June 6, 2022             |         |           |          |             |
| NG-C  | NextGear's UCC-1 financing statement filed on February 24, 2022, file number 22-0009213251 |         |           |          |             |

|      |  |  |  |  |  |
|------|--|--|--|--|--|
| NG-D | NextGear's Receivable Detail Summary dated February 24, 2023 |  |  |  |  |
| NG-E | Buyer's Orders for Five (5) Sold Out of Trust Vehicles       |  |  |  |  |

NextGear reserves the right to amend its Exhibit List and/or supplement the same. NextGear further reserves the right to introduce any document designated by any other party in-interest, as well as any rebuttal documents.

**Respectfully submitted,**

**PADFIELD & STOUT, LLP**

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/s/ Christopher V. Arisco

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*Attorneys for NextGear*

**CERTIFICATE OF SERVICE**

The undersigned converted the foregoing document into an electronic image, via portable document format (.pdf), electronically submitted same to the Internet web portal for the Clerk of this Court utilizing the Electronic Management and Electronic Case Filing system of the Court, which has caused service, via Simple Mail Transfer Protocol (e-mail), of a Notice of Electronic Filing of this imaged document to the below-identified parties on Friday, March 17, 2023; said e-mail provides an attributable hyperlink to the document, in portable document format, except for Debtor(s), and any other entity so identified below or on the EM/ECF filing sheet, whereas in that instance such document was mailed via First Class United States Mail, to-wit:

|  |  |
|--|--|
| <b>DFW Boat Specialists, LLC</b><br>2401 Worthington Dr., Suite 106<br>Denton, Texas 76207<br><br><i>Debtor</i>              | <b>Eric A. Liepins</b><br>Eric A. Liepins, P.C.<br>12770 Coit Road, Suite 850<br>Dallas, Texas 75251<br><br><i>Attorney for Debtor</i> |
| <b>Mark A. Weisbart</b><br>10501 N. Central Expy., Suite 106<br>Dallas, Texas 75231<br><br><i>Subchapter V Trustee</i>       | <b>United States Trustee</b><br>110 N. College Avenue, Suite 300<br>Tyler, Texas 75702   |
| <b>All those receiving ECF notification in this case and on the attached list of the twenty largest unsecured creditors.</b> |  |

/s/ Christopher V. Arisco  
 Christopher V. Arisco

AMERICAN EXPRESS CLASSIC  
GOLD CARD  
PO BOX 650448  
Dallas, TX 75265

American Express  
Blue Business Plus  
PO Box 981535  
El Paso, TX 79998-1535

Axle Funding  
14951 Dallas Pkwy. #200  
Dallas, TX 75254

CarBucks  
417 Woods Lake Rd  
Greenville, SC 29607

Green Note Capital  
1019 Avenue P, Suite 401  
Brooklyn, NY 11223

JPMorgan Chase Bank  
P.O. Box 659754  
San Antonio, TX 78265

JPMorgan Chase Bank  
P.O. Box 659754  
San Antonio, TX 78265

National Funding  
9530 Towne Centere Dr.  
San Diego, CA 92121

NextGear Capital Wholesale  
11799 North College Avenue  
Carmel, IN 46032

WESTLAKE SERVICE INC  
4751 WILSHIRE BLVD, SUITE 100  
LOS ANGELES, CA 90010

**20 Largest Unsecured Creditors**